

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

**SECURITIES AND EXCHANGE COMMISSION, :
Plaintiff, :
- against - :
BARRY C. HONIG, ROBERT LADD, :
ELLIOT MAZA, BRIAN KELLER, :
JOHN H. FORD, GRQ CONSULTANTS, INC., :
and HS CONTRARIAN INVESTMENTS, LLC, :
Defendants. :**

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**STIPULATION AND [PROPOSED] ORDER AMENDING CIVIL CASE DISCOVERY
PLAN AND SCHEDULING ORDER**

IT IS HEREBY STIPULATED AND AGREED, by and among the parties hereto, that the following provisions of the Civil Case Discovery Plan and Scheduling Order, entered on April 2, 2020 (DE 239), shall be amended as follows:

1. Fact discovery cut-off: November 23, 2020.
2. Requests to Admit and contention Interrogatories, if any, shall be served no earlier than 45 days prior to the fact discovery cut-off, or October 8, 2020, and Responses to any Requests to Admit and contention Interrogatories, if any, shall be due 30 days thereafter. Responses to Requests to Admit and contention Interrogatories served prior to this Stipulation and Order shall be adjourned until November 9, 2020.
3. Expert reports shall be served no later than December 14, 2020.
4. Rebuttal expert reports shall be served no later than January 11, 2021.
5. Expert depositions shall be completed by February 12, 2021.

6. ALL DISCOVERY SHALL BE COMPLETED BY February 12, 2021, unless an Answer has not yet been filed. If an Answer has not been filed by February 12, 2021, the parties will confer and jointly propose, within one week after Defendant files his Answer, a schedule for additional Discovery.

7. If an Answer is filed by February 12, 2021, the Court will hold a status conference on February 19, 2021, or another time convenient for the Court. During that status conference, the parties will present a proposed schedule for any motions for summary judgment, pre-trial submissions and trial.

Dated: New York, New York
June 10, 2020

ROBERT LADD

By: /s/ Adam Ford
Adam Ford
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SECURITIES AND EXCHANGE
COMMISSION

By: /s/ Nancy A. Brown
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Attorneys for Plaintiff Securities and
Exchange Commission

SO ORDERED. The Clerk of Court is respectfully directed to adjourn the case management conference scheduled for October 21 to February 19, 2021 at 11 a.m.



Edgardo Ramos, U.S.D.J
Dated: Jun. 10, 2020
New York, New York